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ASSURED HOUSING FOR ONTARIO

A Position Paper



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ASSURED HOUSING FOR ONTARIO

A POSITION PAPER



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SUMMARY:

POSITION PAPER ON ASSURED HOUSING FOR ONTARIO

INTRODUCTION:

The people of Ontario deserve access to affordable, good quality housing. They correctly expect their provincial government to do everything feasible to make this objective a reality.

Assured housing means:

- o a fair and effective system for protecting tenants' rights;
- o equitable treatment for rental property owners;
- o an active government prepared to tackle the backlog of unmet need and emerging problems of the future;
- o a dynamic, efficient private building industry;
- o ongoing co-operation in tangible, practical ways among producers, consumers and governments.

A FAIR, EFFECTIVE SYSTEM FOR PROTECTING TENANTS' RIGHTS

Rent review, landlord-tenant legislation, and other protections for tenants' rights go hand in hand.

On rent review, the Government intends to:

- o involve tenants and rental property owners directly in the process of developing rent review policy and administration;
- o extend the scope of rent review to cover all buildings in the private market, including those constructed after 1975 and those renting for over \$750 a month, to avoid a widening gap between regulated and non-regulated units and to protect all tenants;
- o resolve 70% or more of cases through a conciliation approach to rent-setting decisions by the Housing Ministry rather than through costly, lengthy and adversarial proceedings before a tribunal ... few tenants will need a lawyer;

- o create a new Rent Review Hearings Board with a single, clear-cut role of hearing appeals to replace the present Residential Tenancy Commission which tries, unsuccessfully, to combine three conflicting roles;
- o create a permanent, orderly method for setting the percentage above which rents will be reviewable (4% in 1986) to replace the present ad hoc approach;
- o make permanent, protection previously offered on an ad hoc basis against the "flipping" of buildings in non-productive financial deals ... a 5% cap on rent increases owing to refinancing costs;
- o provide a mechanism for reduction of rents to reflect previously awarded mortgage financing increases no longer being made by a rental property owner;
- o inaugurate a province-wide phone-in registry of rents charged, accessible to all members of the public, initially for larger buildings and then all buildings;
- o provide assistance on a rent-geared-to-income basis to lower-income tenants wherever relevant provincial subsidies are brought into play.

On security of tenure, the Government intends to:

- o take a strong stand against efforts to remove sound, affordable rental housing from the stock through "renovation", profit-oriented "co-operative", condominium conversion and "apartment hotel" schemes and via unnecessary demolitions.
- o work with tenant and landlord representatives to develop new or revised policies on such issues as "key money";
- o establish a task force of roomers and boarders, landlords, and government representative to define further the rights of roomers and boarders.

The Minister of Housing will be working closely with the Attorney General, the Minister of Municipal Affairs and the Minister of Consumer and Commercial Relations on these matters. In addition, a comprehensive examination of the affordability problems of lowerincome tenants is being launched with participation of all relevant ministries and agencies.

EQUITABLE TREATMENT FOR RENTAL PROPERTY OWNERS

Private owners of rental property have rights too. These can be ignored only at the cost of longer-term deterioration in the quality of housing, in the relationships between landlords and tenants, and in the choice of housing.

The Government proposes to:

- o provide for equalization of rents among similar units in a building, phased in over a five-year period;
- o provide an adequate fixed allowance for operating cost increases in the rent review process, substantially reducing the administrative burden on property owners;
- o provide for post-1975 buildings which are not yet renting at an economically-viable level to move over a period of five years to that level;
- o fundamentally simplify and streamline the whole rent review process ... under the new system, few property owners will require a lawyer; certainty will be substantially increased, and long delays in decisions avoided;
- o provide forgiveable loans of up to \$5,000 per unit for owners of older low-rise rental housing stock to bring their units up to minimum property standards;
- o fund research and development on the repair and maintenance of high-rise buildings;
- o help organize long-range training and advisory services to owners of older low-rise rental buildings and support a new code of ethics for rental property owners being put forward by the Urban Development Institute.

A study of what can be done to give hardship relief to landlords receiving abnormally depressed rents will be part of the affordability study noted above.

MEETING BOTH UNMET AND FUTURE NEEDS

Some 200,000 households renting in Ontario cannot afford decent housing; 30,000 - 40,000 are on waiting lists for what is available. Many lower-income home owners cannot afford to keep their properties in good repair.

The Minister of Housing will:

- o commit a net additional 10,000 non-profit and cooperative housing units over the next three years, using a redesigned program that targets assistance more effectively;
- o provide loans to developers of private rental accommodation, interest-free for 15 years, to produce 5,000 units of new, affordable, rental housing;
- o offer land from provincial holdings to support private and non-profit rental projects;
- o fund 6,000 additional Convert-to-Rent dwellings;
- o take on added responsibility for housing programs in the province under arrangements with the federal government;
- o ensure that rent-geared-to-income units are offered as a matter of course wherever provincial subsidies are given, in order to integrate lower-income people throughout the community;
- o as recommended by the Association of Municipalities of Ontario, redirect funds already allocated under the Ontario Home Renewal Program from inactive to active municipalities, allowing some 4,000 additional homeowners to bring their dwellings up to standard.

The changing age structure of Ontario's population -more senior citizens proportionately every day -- is
posing new housing challenges for the future. More and
more Ontarians are living on their own. More and more
dwellings have room to spare.

The Housing Minister will:

- o support efforts to test the idea of equity cooperatives for senior citizens;
- o expand the popular Convert-to-Rent interest-free loans to recipients to create hostel-type units for single persons (roomers) and to add units in single family homes;
- o support the development of senior citizens' retirement communities on a pilot basis;
- o support local home-sharing projects, usually involving senior citizens, in making space available to others;

- o encourage non-profit and co-operative housing projects for single persons on an experimental basis;
- o provide additional Convert-to-Rent aid for wheelchair access.

The above programs will see active co-operation among the Minister of Housing, the Minister responsible for Senior Citizens Affairs, the Minister responsible for the disabled and the Attorney General.

A STRATEGY FOR A DYNAMIC BUILDING INDUSTRY

Construction of buildings is Ontario's single largest and most important industry. It faces fundamental new challenges as an activity because of Canada's much slower population growth and changing economy.

The Minister of Housing will work closely with the Ministers of Industry, Trade and Technology and Skills Development to:

- o promote export development and replacement of imports in the building construction field;
- o simplify and improve administration of provincial regulations, building standards, etc. affecting this industry;
- o support industry training programs and co-operative efforts to increase the use of new technologies;
- o assist in creating a Building Industry Centre to bring together products, markets, information, training and technological research identified and provided by the industry itself;
- o create an advisory agency composed of private and public sector representatives to formulate further details of this strategy.

CO-OPERATION AMONG PRODUCERS, CONSUMERS AND GOVERNMENT

It is easy to call for co-operation by others, but cooperative efforts, despite the best intentions, will tend to fade away if all participants are not actively engaged in serving their own as well as broader interests. The Minister of Housing will:

- o provide a tenant-landlord Rent Review Advisory Committee with the necessary resources to undertake their own research and pilot projects;
- o provide financial assistance for municipalities to monitor better the condition of their housing stock as an aid to the policies and programs of both governments;
- o provide loans to municipal and private non-profit housing groups to help them start up projects and get them underway;
- o provide incentive grants to municipalities which modify their standards and approval processes to encourage home-ownership production affordable by those with modest incomes on a demonstration basis.

CONCLUSION

The initiatives announced in this package meet fully the commitments made by the Premier of Ontario in his statement to the Legislature of July 2, 1985.

The Legislature is being asked to provide speedy passage to two short bills to extend rent review provisions expiring December 31, 1985, and to allow implementation of measures effective last August 1.

A more extensive debate can be expected on legislation embodying overall reforms to rent review. This will give broad enabling authority which allows substantial scope for further consultation on details with tenant and landlord representatives.

In the meantime, the Minister of Housing in concert with other Ministers will move ahead on measures to increase rental supply, meet urgent needs, support building industry development and create new mechanisms for practical co-operation among all partners in the housing field.

Comprehensive though it is, this package is just a foundation for the future. There is more to be done, on affordability for lower-income renters in particular. Within a year, additional measures are likely to be ready. For the moment, everyone concerned in industry, government, and the voluntary sector has much work to do.

INTRODUCTION

People in Ontario work hard. They assign a high priority to housing. As a result, they enjoy some of the best living conditions in the world. A survey conducted in 1984 shows that only 0.5% of dwellings lack basic sanitary facilities. 1981 figures reveal that only about 0.6% of the province's dwellings are overcrowded. While even these small figures, amounting to 20,000 - 30,000 homes, are not acceptable in this day and age, they help to indicate a very dramatic improvement since the end of World War II.

But significant problems remain. Some 200,000 renter households still cannot afford decent accommodation. Tenants across the province are uneasy about the future: Will rent review remain? Will their units be kept in reasonable repair? Will they be able to find a vacant unit when they want to move? Rental property owners similarly wonder whether their businesses will remain viable, whether further regulation will restrict their activities.

The construction and sale of new dwellings for home ownership has increased substantially since the recession of 1981-82. However, nearly 20% of all workers in Ontario's building industry remain unemployed and have little prospect of an early return to work.

This position paper sets out a policy to achieve assured housing for the people of Ontario. It is the first overall statement of housing policy in over a decade ... and it is more comprehensive than any previous statement. Rent review, landlord-tenant relations, social housing, special needs housing, home renovation, land development, community planning and the building industry as a whole are all addressed by it.

The Government of Ontario believes that a housing policy for the province must be based on five elements which combine to give the assurance our people need and expect.

"Assured housing" means:

- o vigorous, fair and effective protection of the rights of tenants;
- o equitable rules for rental property owners, administered efficiently and in a climate of certainty;

- o an active government which tackles both the backlog of unmet need and the emerging problems of the future with ingenuity and persistence;
- o a flexible, efficient and dynamic building industry which seizes new market opportunities and stays at the leading edge of technology and labour-management relations;
- o a practical day-to-day "climate of co-operation" among producers, consumers and governments in relation to housing policies, programs and implementation.

This position paper will describe each of these elements further. It will set out specific proposed actions by the Ontario Government.

First, it is important to place things in context by giving a picture of our current housing situation and indicating what the future may hold.

ONTARIO'S HOUSING SITUATION

Ontario's housing offers a wide range of choice to residents and newcomers who can afford it. Table 1 present an overall picture of the housing stock and the kinds of households which occupy it. Over the past several decades both the types of housing and the types of households have become more diverse.

As of March, 1984, the province had 3,179,000 occupied dwellings, of which an estimated 1,122,000 were rental (35%) and 2,058,000 (65%) were owned by their occupants.*

While 49% of all freehold properties in Ontario do not have a mortgage, most purchasers have to spread their payments out over time using this device. As of the end of 1983, \$50 billion in mortgage loans remained to be repaid in Ontario. About \$9.4 billion in such loans were issued on over 200,000 new and existing dwellings last year. \$6.3 billion was spent on housing construction and repairs. Housing is a big business and one which involves the largest single portion of both household expenses and savings in Ontario. Table 2 gives a picture of recent housing and production investment.**

The generally increasing quality of Ontario housing, coupled with high real interest rates, rising energy costs and local taxes have combined to push up the overall cost of housing in the Province. Housing is a basic necessity, but it can also be an investment and a reflection of social status. Hence, when people's incomes rise, they are willing to bid more for housing and help generate price increases. The expectations that values would always rise grew throughout the 1970s, and itself has helped to push values up.

Over the past decade, the cost of housing construction in Ontario has more than doubled; rents have risen 73% and overall ownership costs 119%. Mortgage interest costs are 155% and utilities 219% higher than they were.

^{*} Source: Statistics Canada, Catalogue No. 64-202

^{**} Source: Canadian Housing Statistics, 1984

TABLE 1
ONTARIO'S HOUSING STOCK, 1984

TENURE OF HOUSEHOLD		
	NUMBER	- 8
RENTED	1,122,000	35.3
OWNED	2,058,000	64.7
TOTAL	3,179,000	100.0
DWELLING TYPE		
SINGLE DETACHED	1,833,000	57.7
ATTACHED	409,000	12.9
APARTMENT	919,000	28.9
MOBILE HOME	18,000	0.5
TOTAL	3,179,000	100.0
Source: Statistics C	anada. Catalogue No.	64-202

ONTARIO'S HOUSEHOLDS

	1971	1981
Husband-wife families	1,681,046	2,028,690
Lone parent families	44,190	250,285
Non-family households	402,930	690,810
TOTAL	2,228,160	2,969,785

Source: Statistics Canada, Census of Canada

TABLE 2
HOUSING PRODUCTION IN ONTARIO (STARTS)

	SINGLE DETACHED	ATTACHED	APARTMENT
1980	18,693	8,454	12,980
1981	24,440	10,396	15,325
1982	17,836	6,216	14,456
1983	33,804	5,561	.15,574
1984	32,851	5,248	10,072
1985 (To Sept	30,159	4,131	11,182

Sources: Canadian Housing Statistics, 1984

Statistics Canada, Catalogue No. 64-002

HOUSING EXPENDITURE IN ONTARIO

(\$ MILLIONS)

	NEW CONSTRUCTION	REPAIR	TOTAL
1980	3,318.4	1,121.9	4,260.2
1981	3,743.4	1,255.4	4,998.8
1982	3,139.8	1,335.5	4,475.3
1983	4,375.8	1,499.6	5,875.4
1984	4,686.2	1,589.2	6,275.4
1985	4,998.0	1,664.0	6,662.0

Source: Statistics Canada, Catalogue No. 64-201

^{*} Includes conversions, additions, etc.

The growth of household incomes has allowed the majority of Ontarians to meet these costs. Many, particularly two-income familes, have improved their housing markedly. But others have not been so fortunate. Their situation has worsened for one or more of the following reasons:

- o loss of older affordable rental stock through demolition, conversion, or renovation;
- o loss of employment income;
- o loss of purchasing power of a fixed income... pension, etc.;
- o marriage breakup and loss of a main earner in the household;
- o disability;
- o discrimination in a tight rental market.

These changes in people's lives are reflected in the statistic of 180,000 to 200,000 households now renting who are paying too much for housing that is below basic standards and/or too small for their needs. 30,000 to 40,000 have put themselves on the waiting list for assisted housing, which operates on the basis of the household's income. Rents can range from 16.7 % to 25% of income.

While households below the poverty line have been increasing in number and the affordable housing in private ownership disappearing, the production of publicly-sponsored or assisted rental housing has been dropping off. Formerly in the 8,000 units a year range, it is now more like 5,000 units. Of these, just 1,500 to 2,000 dwellings are offered on a rent-to-income basis annually. At the present rate, it could take many years to meet the needs of those paying too much for inadequate shelter... a clearly unacceptable circumstance.

This situation could be considerably worse had not a rent review system helped to hold the rate of rental increases to below the overall rate of inflation during much of the period. If rents were to rise by an average of \$200 a month, many additional Ontario households would enter the need category. They could require hundreds of millions of dollars in subsidies, above and beyond the \$340 million currently paid by the province, just to hold things even. Perhaps \$240 million more would be required annually to clear up the present backlog of need in Ontario if private market rents did not rise unduly, based on an average shortfall of \$100 a month in affordability.

Strine

Rent review is not <u>rent control</u>. It permits cost increases to be passed on to tenants in their rents. Indeed, rents which are approved by the system are about 50% above the guideline rate of increase, on an average.

The present form of rent review has some important defects:

- o it provides inadequate protection for tenants, many of whom are forced to pay illegal rents while others are denied its protection;
- o it risks the permanent creation of a two-tier rental market... units under review and those not under review;
- o it lacks certain safeguards against circumvention by property owners;
- o it inhibits rental construction and provides a disincentive to proper building maintenance;
- o it is administratively complex, contradictory and cumbersome.

Correction of all of these defects would not begin to constitute an adequate housing policy for Ontario. Rent review assists lower income tenants no more, and sometimes less than any other tenants. It benefits many higher income households (an estimated 26% of those in modest rental accommodation).

Clearly, it needs to be complemented by programs to:

- protect tenants from other abuses of their rights, aside from arbitrary rent increases,
- o conserve and repair the rental housing stock;
- o provide assistance to those in need;
- o design and provide dwellings to meet special needs;
- o hold overall costs of construction and repairs down as much as possible.

Ontario's housing situation is hopeful, but there are some serious problems to be corrected as well. Attention should not be addressed to these problems in a static way... they are part of a larger, changing set of trends for the future.

PROSPECTS FOR THE FUTURE

The need for housing in Ontario is dependent on the kind of population we are going to have and on how people arrange their households.

In the past few years, certain trends have become very well-established in Ontario.

- o the growth of the population as a whole is slowing... present forecasts envisage an end to our growth after the year 2015;
- o some age groups in our population are growing as a proportion of the whole, notably the elderly and prime working age adults;
- o others age groups are declining rather rapidly, notably high school age people and young adults;
- o while growth of most urban centres continues, the rate of growth has slowed;
- o the types of households to be accommodated has become much more diverse; the days when a typical household consisted of a working husband, a housewife and three or four children are long gone in Ontario; there are over a million families with both spouses working.

Key population growth trends are set out in more detail in the table on the next page.

The implications of Ontario's changing population for housing are clear and dramatic:

- o by the end of the century, the overall demand for housing will decline, and the conservation and alteration of the existing housing stock will become still more important;
- o the demand for high quality, well-located, smaller home ownership housing is likely to remain strong, as is the need for accommodation incorporating some health care facilities;
- o the demand for basic rental housing to accommodate the person or couple with their first job will remain high in the short term but may decline as we near the turn of the century;
- o there remain significant needs for low-rise or ground-oriented low-rent housing to accommodate single parents with one or two children.

TABLE 3
PROJECTED POPULATION OF CANADA (MILLIONS)

YEAR	POPULATION
1986	25.6
2006	28.1
2016	28.2
2026	27.5
2031	26.8

Source: Statistics Canada, Catalogue No. 91-520

PROJECTED ONTARIO POPULATION, SELECTED AGE GROUPS, 1985-2005 (THOUSANDS)

AGE	1985	1990	1995	2000	2005
0-4	614.2	611.0	555.1	490.3	461.4
15-19	702.3	660.7	632.1	653.3	641.1
20-24	847.8	731.0	680.4	651.8	672.9
40-44	564.7	717.2	761.8	832.2	891.5
70-74	268.4	290.2	368.8	387.3	391.1
TOTAL POPULATI	9043.0	9545.9	9894.7	10125.8	10270.4

Source: Statistics Canada, Catalogue No. 91-520

Changes in the demand for housing obviously have a profound effect on the building industry in this province.

In 1984, the construction of buildings provided about 380,000 jobs in Ontario. 80,000 firms were involved, and \$11.3 billion was spent on houses, factories, stores and offices... on the creation and regeneration of our urban communities.

Today's consumers of housing are more and more sophisticated and have a fine eye for detail. The quality of finishing work and some basic difficulties in adopting new technologies, such as energy-efficient equipment and air tightening, are reducing the competitiveness of building firms.

As the technology of building changes, more and more items are being imported, displacing jobs that Ontarians could be doing. The building industry is organized into different trades and types of activity. However, it has recently begun to work together as a whole sector.

Building construction is one of the most heavily regulated industries in the Province.

Changing market conditions and a heavily affected construction and development industry call for four things:

- o careful orientation of government programs toward new realities so that inappropriate solutions to old and disappearing problems are avoided;
- o close consultation between those working daily in the building market: builders, social agencies, realtors, municipal officials and others, and those designing and delivering government programs, to detect and act on changes early;
- increased certainty and stability in the climate and in the regulatory framework surrounding the private sector;
- o the development of an international focus for coordinating the building industry's design and marketing activities.

A PLAN FOR ASSURED HOUSING

The Minister of Housing believes that public and private sector planning can be substantially improved if an overall set of housing goals is enunciated. These goals are not intended to be "cast in stone", but they should help all concerned to organize their own activities and provide reference points for assessing what is being achieved and to adjust to changing markets.

The Minister of Housing has set the following housing goals for Ontario for the period 1986-1990:

- o 345,000 new housing units, rental and ownership, are required to maintain the present level of housing availability;
- o 25,000 units in addition are needed to overcome the backlog of need;
- o of the 370,000 total, almost 50,000 must be built for those who require at least some income assistance to meet their housing needs;
- o reflecting growth in the working age population, a healthy home ownership market should produce more than 250,000 units; no home ownership stimulation by government appears to be required at present or for the foreseeable future;
 - o under the new rent review system, the private rental market is expected to produce 34,700 units, beginning with 1,100 units in 1986;
 - o 5,000 new rental units should be produced in 1986 and 1987 with government assistance while the unassisted rental market recovers;
 - o 30,000 units of the existing stock should be renovated.

The Government of Ontario contribution to this proposed plan is to provide:

- o a climate of confidence and stability for private investment;
- o assistance to improve building industry productivity and resiliency;
- o grants and loans to support the production of social housing and low-cost housing;
- o grants and loans to support moderate-priced renovated and converted units.

PROTECTING THE RIGHTS OF TENANTS

During the 1970s, landlord/tenant relations were a recurring issue... and the basic theme was always the same: how to achieve a balance between the rights and interests of tenants and those of landlords.

Following extensive study by the Ontario Law Reform Commission, the first modernization of the Landlord and Tenant Act in over 50 years came into effect January 1, 1970. These changes sought to improve protection for tenants against arbitrary actions by landlords.

At the end of 1975, rent review was introduced, tenants were given security of tenure, and provision was made for notices of rental increase.

The 1979 Residential Tenancies Act sought to bring together into one piece of legislation the portions of the Landlord and Tenant Act dealing with housing and the provisions for rent review.

However, both landlords and tenants attacked this new legislation vigorously. As a result, some major portions were never brought into force... namely, those dealing with relations between landlords and tenants aside from rent review. The previous Landlord and Tenant Act carried on.

The Government of Ontario intends to make a clean break from the complexity and confusion of the past.

Security of tenure and rent review are complementary policies. But the actual application of security of tenure protections (Landlord and Tenant Act) and rent review protections should be different to recognize clearly the different processes at work.

Regarding rent review, the Government intends to:

- o directly involve tenants and rental property owners in the process of developing rent review policy and administration;
- extend the scope of rent review to cover virtually all buildings in the private market, including those constructed after 1975 and those renting for over \$750 a month, to avoid a widening gap between regulated and non-regulated units and to protect all tenants;
- o resolve 70% or more of cases through a conciliation approach to rent-setting decisions by the Housing Ministry rather than through costly, lengthy and adversarial proceedings before a tribunal ... few tenants will need a lawyer;

- o create a new Rent Review Hearings Board with a single clear-cut role of hearing appeals to replace the present Residential Tenancy Commission which tries unsuccessfully to combine three conflicting roles;
- o create a permanent, orderly method for setting the percentage above which rents will be reviewable (4% in 1986) to replace the present temporary approach;
- o make permanent, protection previously offered on an ad hoc basis against the "flipping" of buildings in non-productive financial deals ... a 5% cap on rent increases owing to refinancing costs;
- o provide a mechanism for reduction of rents to reflect previously awarded mortgage financing increases no longer being paid by a rental property owner;
- o inaugurate a province-wide phone-in registry of rents charged, accessible to all members of the public, initially for larger buildings and then all buildings;
- o provide assistance on a rent-geared-to-income basis to lower-income tenants wherever relevant provincial subsidies are brought into play.

In relation to security of tenure, the Government of Ontario intends to:

- o take a strong stand against efforts to remove sound, affordable rental housing from the stock through "renovation", profit-oriented "co-operative", condominium conversion and "apartment hotel" schemes and via unnecessary demolitions;
- o work with tenant and landlord representatives to develop new or revised policies on such issues as "key money";
- o establish a task force of roomers and boarders, landlords, and government representatives to define \lor further the rights of roomers and boarders.

The Minister of Housing will be working closely with the Attorney General, the Minister of Municipal Affairs and the Minister of Consumer and Commercial Relations on these matters. In addition, a comprehensive examination of the affordability problems of lowerincome tenants is being launched with participation of all relevant ministries and agencies.

TREATING RENTAL PROPERTY OWNERS EQUITABLY

Owners of rental property have a right to fair treatment as well. While it may be possible to deny or ignore these rights in the short term for reasons of political expediency, fundamental problems will be created over the longer term. The effect of unfairness to rental property owners may be to destroy or seriously damage government policies in the eyes of tax-payers as a whole, and even of tenants themselves.

The Government of Ontario is convinced that the owners of private rental property have a vital role to play in our Province's housing market. What is more, the Government believes that owners of rental property can find long-term viability under a new system of rent review.

The Government intends to:

- o provide for equalization of rents among similar units in a building, phased in over a five-year period;
- o provide an adequate fixed allowance for operating cost increases in the rent review process, substantially reducing the administrative burden on property owners;
- o provide for post-1975 buildings which are not yet renting at an economically viable level to move over a period of 5 years to that level;
- o fundamentally simplify and streamline the whole rent review process ... under the new system, few property owners will require a lawyer; certainty will be substantially increased, and long delays in decisions avoided;
- o provide forgiveable loans of up to \$5,000 per unit to eligible owners of 17,000 older low-rise rental housing units to bring them up to minimum property standards... small property owners, in particular, deserve and need encouragement to stay in the market;
- o fund research and development on the repair and maintenance of high-rise buildings;
- provide training and advisory services for property owners and tenants to help them better understand their rights and responsibilities;
- o provide specialized training for owners of smaller rental buildings;

- o support the lead taken by the Urban Development Institute in the promotion of a new code of ethics for rental property owners;
- o develop a mechanism to provide for hardship relief to landlords receiving abnormally depressed rents as part of the affordability study noted above.

A comparison of the present and proposed rent review systems is given in the table on the next two pages. Because of the extensive nature of the changes to rent review policy, a separate position paper has been prepared as a companion to this document.

TABLE 4

RENT REVIEW: A COMPARISON BETWEEN PRESENT AND PROPOSED POLICIES

PRESENT SYSTEM

PROPOSED SYSTEM

- 1. Scope of rent review:

 Virtually all private units renting for under \$750 and built before 1976
- 2. Rent increase above which review applies: established by legislation from time to time on an irregular basis
- 3. Elimination of economic loss not a consideration in any rent review calculation
- 4. Increases in operating costs:
 determined on a case by case
 basis
- 5. Increases in rents owing
 to refinancing: capped at
 5% on temporary basis, due
 to expire Dec. 31, 1985
- 6. Relief for landlords with abnormally depressed rents: not allowed
- 7. Reduction of rents to reflect costs no longer borne by landlord, e.g., mortgage payments: no provision
- 8. Equalization of rents among units of the same type:
 no provision

Virtually all private units regardless of rent level or date of construction

Established annually according to a formula which changes more slowly than increases or decreases in the rate of inflation

Provided for in a formula to establish maximum legal rents in post-1975 units

Adequate fixed allowance for increased operating costs provided for on all units

Cap at 5% of costs allowed for pass through extended permanently

To be allowed subject to limits to be determined and provision for aid to tenants

Provided for on application by tenants, in regard to mortgage financing cost increases previously allowed under rent review

Unit rents may be equalized based on a rent review application to phase in changes over 5 years

TABLE 4 Cont'd.

9. Rent review on non-profit housing:
not applicable

Same

10. Rent registry coverage: no registry

Rents in buildings of over 6 units to be registered as at July 1, 1985; small buildings to be registered later

11. Rent registry:
status of contents:
no registry

Registry information to be publicly available

12. Rent Review administration and decisions: carried out by Residential Tenancy Commission which combines policy, administration and quasi-judicial (court-like) functions

Separation of functions:
policy and administration
to the Ministry of
Housing; judicial role to
a new Rent Review
Hearings Board,
which replaces
Residential Tenancy
Commission

TACKLING THE BACKLOG OF NEED

Recent public opinion polls show strong support among Ontarians for addressing the problems of those who still need adequate, affordable housing. A majority support the expenditure of more tax dollars on virtually every need group. Overwhelming majorities support housing for the elderly, the handicapped, and low-income people.

Public support is, of course, only one aspect of the situation. This is a moral question as well as a political one. People have a right to expect a basic level of shelter, just as they expect basic health care and income support in a society as rich as Ontario's. In the past, the Government of Ontario has responded with assistance for over 121,000 dwellings rented to people on the basis of their incomes.

Since the 1970s in particular, municipal, private, and co-operative non-profit corporations have been playing an increasing role in providing affordable housing across Ontario. Over 53,000 such dwellings were available as of the end of 1984. But more needs to be done by both the "third sector" and the Province.

As indicated above, some 200,000 households renting in Ontario cannot afford decent housing; 30,000 - 40,000 are on waiting lists for what is available. Many lower income home owners cannot afford to keep their properties in good repair.

The Minister of Housing will:

- o commit a net additional 10,000 non-profit and cooperative housing units over the next three years, using a redesigned program that targets assistance more effectively;
- o provide loans to developers of private rental accommodation, interest-free for 15 years, to produce 5,000 units of new, affordable, rental housing over the next 2 years;
- o offer land from provincial holdings to support private and non-profit rental projects;
- o fund 6,000 additional Convert-to-Rent dwellings;
- o take on added responsibility for carrying out housing programs in the province under arrangements with the federal government;

- o ensure that rent-geared-to-income units are offered as a matter of course wherever provincial subsidies are given, in order to integrate lower-income people throughout the community;
- o as recommended by the Association of Municipalities of Ontario, redirect funds already allocated under the Ontario Home Renewal Program from inactive to active municipalities, allowing some 4,000 additional homeowners to bring their dwellings up to standard.

The main approach to reducing the backlog of need in Ontario is the production of new non-profit and co-operative units.

The non-profit housing program is being redesigned to make it more effective:

- o up to 100% of such units can be rented to needy people, rather than a maximum of 40% as at present;
- o a special allocation of up to 1,000 units in 1986 is being made available for co-operative housing;
- o project development loans will be provided to municipal and private sponsors of non-profit housing projects;
- o a competitive system and price guidelines will ensure that projects meeting provincial objectives will be funded;
- o grants towards operating costs of non-profit units at market rents will be reduced by a set percentage annually to give an incentive for effective management;
- o a portion of units will be rented to people with moderate incomes who are still unable to obtain suitable accommodation without paying more than 30% -- they will be charged 25% of income as are those at the top of the rent-to-income scale;
- o non-profit and co-operative housing projects for single persons will be eligible on a demonstration basis.

In addition, the Ministry of Housing is examining the possibility of lowering the eligible age for housing assistance to 55 years in recognition of the severe problems faced by some people in their pre-retirement years.

A growing issue in major urban centres of Ontario is the loss of housing stock previously occupied by roomers and boarders. While the provision for hostel-type accommodation under the Convert-to-Rent program should be of some assistance in this connection, the whole question of both rights and supply for these people needs to be addressed. A joint government/roomer - boarder/private sector task force is being created to create innovative approaches to the needs of these people.

Finally, the Ministry of Housing, in conjunction with other relevant ministries and agencies, is considering what innovations may be required to ensure that students and native people are properly housed.

ADDRESSING THE PROBLEMS OF THE FUTURE

The forecasts of Ontario's future population presented above have profound implications for the types of housing needs which are likely to arise and also the kinds of use that may be made of existing housing stock.

Whatever assumptions are made about the future size of households in the province, one thing is clear: much of the housing stock we are going to need for the next twenty years is already here (Table 5). Under the most likely prospect, about 900,000 additional units will be required to accommodate a combination of population growth and more households. The present plan is to construct more than a third of this total within the coming five years.

Three major problems are looming on the horizon in the future:

- o fewer and fewer people tend to occupy more and more space;
- o the existing stock of housing, much of which is low-density suburban, will be less and less welladapted to the needs of the population;
- o more and more elderly people will require housing which is accessible by the disabled.

It is still too soon to settle on permanent solutions to these problems. Most people are still concerned about the existence of shortages, rather than an overabundance of housing.

The choice of living arrangements and the desire to use certain amounts of dwelling space are obviously highly personal matters. But the time has come to experiment boldly with new approaches, working out any "bugs" so that they can be presented confidently as more general solutions in the future.

TABLE 5

ACCOMMODATING THE POPULATION OF THE YEAR 2005

	DWELLINGS	NET ADDITION
PRESENT ONTARIO HOUSING STOCK	3,179,000	
TOTAL STOCK TO ACCOMMODATE 2.9 PERSONS PER HOUSEHOLD	3,542,000	363,000
2.5 PERSONS PER HOUSEH	OLD 4,180,160	929,160
1.6 PERSONS PER HOUSEH	OLD* 6,419,000	3,240,000

^{*} This is an average household size found only in some inner-city areas, and is very unlikely to be either economical or socially desirable for the province as a whole. It implies a population consisting mainly of one and two person households, with the former in a majority.

As Table 6 suggests, there is a substantial amount of housing already which appears, on the face of it, to have room for more people. A considerable number of those who occupy such dwellings are, no doubt, quite content to do so. Others, however, might like to see more people living in their home but simply do not know how to go about arranging it safely and agreeably. In many cases, local by-laws may be inhibiting conversion.

As many as 363,500 dwellings in the province, 16.5% of the total, have the potential for offering extra space when both one-and two-person households are considered.* So the potential is substantial.

Over the past year, "match and share" projects have been operating on a pilot basis in Ottawa-Carleton and in Metropolitan Toronto. These are operated by charitable, church, or other voluntary sector groups with very modest government financial support. They seek both people with space to offer in their home and people seeking space, and provide counselling throughout. So far, those willing to share their homes tend to outnumber those who want to move in.

It will take time for the idea to catch on, and for some images of sharing accommodation to fade from immediate post-war and student days.

The population of Ontario over 65 years old is going to grow by some 605,000 people in the next 20 years (62%); the potential is for a great many more single persons and couples living in homes purchased when they had substantial families.

Arrangements to share accommodation are obviously only one approach to this situation. Others include:

- o the creation of means for senior citizens to retain ownership benefits and to share homes or buildings;
- o the creation of additional self-contained units within larger older dwellings to provide separate entrances for both households;
- o the provision of a smaller separate building with access to the main house (the so-called "granny flat");
- o the building of additions which allow a substantial increase in the number of persons, possibly coupled with the provision of care services through a livein worker, etc.;

^{*} In the case of 2-person households, counting started 2 persons in 6 rooms or more.

TABLE 6

POTENTIAL UNDERUTILIZATION OF HOUSING IN ONTARIO, 1981

	RENTERS	OWNERS	TOTAL
ONE PERSON IN FIVE ROOMS	43,605	48,745	92,350
ONE PERSON IN SIX ROOMS	12,675	52,700	65,375
ONE PERSON IN SEVEN ROOMS	4,735	27,550	32,285
ONE PERSON IN EIGHT ROOMS	2,820	14,980	17,800
ONE PERSON IN NINE ROOMS	1,475	6,020	7,495
ONE PERSON IN TEN ROOMS	2,570	6,350	8,920
TOTAL	67,880	156,345	224,225

Source: Statistics Canada, Catalogue No. 93-942

Note: Bathrooms and hallways are not counted as "rooms" in the above and thus are in addition to them.

o the building of distinct retirement communities.

The Minister of Housing intends to act on all of these possibilities:

- o by providing support for approximately 10 projects, totalling 60 units, of renovated existing housing in the form of senior citizens equity co-operatives, to a total of \$0.6 million;
- o by enlarging the terms of the Convert-to-Rent interest-free loan program to support creation of legal, self-contained rental units in existing single family homes to a total of \$7.0 million for 1,000 such units;
- o by continuing its current "granny flat"demonstration program;
- o by supporting the development of planned retirement communities on a demonstration basis through grants of \$2,000 to municipalities for each unit sold, to a maximum of 950 units and \$2 million.

In addition, the Housing Ministry will recognize the need for assisting wheelchair access to dwellings by the disabled of whatever age by offering interest-free loans of up to \$2,000 for adding such facilities to Convert-to-Rent units. Up to 500 units and \$1 million are involved.

Senior citizens are a substantial and well-recognized proportion of Ontario population today. But more and more people are entering the pre-retirement years of their lives. Higher divorce rates and changing lifestyles are producing larger numbers of single person households. Initiatives already noted to allow Convert-to-Rent to be used for creating hostel-type accommodation, and to include singles in the non-profit and co-operative program on a pilot basis are also a part of preparing for a more flexible use of housing stock and housing programs in the future.

The conversion and renovation of dwellings has been a salvation for many of those in the building industry during the difficult years 1979 - 1982. It is clear that the building industry as a whole must be considered in meeting the housing needs of the future.

A BUILDING INDUSTRY STRATEGY

In 1985, a total of \$12.1 billion will be spent on the construction, repair and alteration of buildings in Ontario. This constitutes 69% of all construction activity in the province.

Building construction is the single largest employer in the province. Twice as many people work in it as in the manufacture of automobiles and parts. It also has a much more widespread impact on local economies across the province than virtually any other sector.

Yet the building industry has been taken for granted by past governments. It has tended to be viewed in bits and pieces, rather than as a single industry. Eighty thousand firms engaged in manufacturing of materials and components, general building contracting, specialty trades contracting, engineering and architectural consultancy, and many other types of activity are included among its ranks. Its scope includes industrial, commercial and institutional as well as residential building.

Over 125 different associations speak for the industry, ranging from small groups of specialty trades to representatives of large multinational, integrated development firms, whose main region of operations may be outside the province altogether.

The building industry as a whole has experienced flat or declining conditions since the latter part of the 1970s. It has shrunk by 27% in relation to the provincial economy over the past ten years. Unemployment now ranges around 20%, seasonally adjusted.

The industry has come through the period leaner and very willing to tackle new types of activity.

It is vitally important for the Government of Ontario to put its own house in order to respond fully and effectively to this industry need.

There are five essential ingredients for a dynamic, resilient, and efficient building industry:

- o a competitive position in world markets;
- o a simpler, clearer, more accommodating, better coordinated regulatory environment;
- o a well-trained management group and labour force with ready access to the latest technological developments;

- o a way to bring together in one place information, new products, communication and other services to the industry as a whole;
- o a permanent mechanism for ongoing consultation between industry and government.

The Minister of Housing has been working very closely with the Minister of Industry, Trade and Technology and the Minister for Skills Development, and consulting other ministers as necessary to produce a comprehensive building industry strategy which responds fully to the needs identified by industry representatives themselves.

This strategy has five parts.

First is export development and import replacement.

Annual building-related imports to Ontario currently range between \$2.2 and \$2.5 billion while the Province's exports in building products and services are some \$3.9 billion; about 67% are destined for U.S. markets. In recent years, exports to the U.S. have benefited from the comparatively lower value of the Canadian dollar.

The building industry and the Government of Ontario agree on the need to:

- o retain and expand our market shares of current export destinations;
- o maximize the value added to existing exported goods and services;
- o expose the building industry to new opportunities in export markets;
- o identify import replacement opportunities and possibly future threats;
- o expose both foreign and domestic buyers to our products and services;
- o overcome current information and other barriers within the industry and its firms which hinder export activity, e.g. establish a framework for formation of consortiums;

o make federal and provincial government programs and services related to export development and import replacement more effective.

Three initiatives would have a particularly strong impact on import replacement and export development:

- o better information on market opportunities;
- o creation of a construction information system to integrate some 16 different sources of data... as a first step, a feasibility study is required;
- o a world-class Building Industry Centre.

A second element of the strategy is to simplify and improve administration of provincial regulations affecting the industry.

There may be as many as 281 Provincial Acts and 472 sets of Regulations affecting some aspect of building activity. There is a vast complex of municipal bylaws, federal legislation and regulations, standards set by national agencies, and regulations established by special purpose industry bodies.

The regulatory structure can impede innovation and the adoption of advanced building systems, materials and designs. It creates conflicts in interpretation which lead to costly delays at various stages in the building process.

Since 1983, progress on reform has been made several areas, including: consolidation of regulations administered by a number of ministries into the Ontario Building Code; creation of training programs for building inspectors; and provision of grants to municipalities to improve the administration and erforcement of regulations.

Potential reforms to be accelerated under the new strategy are:

- o elimination of duplicate plans examination and inspections;
- o replacement of prescriptive regulations with performance standards, enabling certified architects and engineers to assume full responsibility for Code compliance without municipal review and inspection;
- o improved mechanisms for approval of new products;
- o increased discretionary authority for qualified municipal officials;
- o simpler Building Code appeal procedures.

A third element of the strategy is improvement of management and labour skills at all levels and the complementary expansion of the capacity to actually use new ideas and technologies more rapidly and effectively.

Research and development expenditures in the building industry are currently at between 0.1% and 0.2% of annual construction expenditures, far short of the federal target of 1.5%.

Low levels of research mean low levels of technology take-up. In technologically-based industries, the channels of communication and the movement of personnel between industry and the universities are intense. The resulting cross-fertilization of ideas creates a problem-solving and highly innovative environment.

The strategy will address a series of industry-wide problems, relating to training including, for example:

- o training requirements other than those covered by the Apprenticeship and Tradespersons Qualifications Act, e.g. estimators, construction superintendents, middle managers, senior managers, researchers;
- o the need to redirect existing training programs to facilitate the adoption of new technology;
- o the need to cushion the human costs of transition to new technologies;
- o the need to involve existing industry agencies within an overall training strategy, e.g. Construction Management Development Institute.

To support all of the above steps, the new strategy would:

- o work with the industry to study the feasibility of a Building Industry Centre to bring together products, markets, information, training and technological research identified and provided by the industry itself;
- o create an advisory agency composed of private and public sector representatives to examine other ways of addressing the problems of the building industry.

A fundamental way in which the Government of Ontario is promoting industry development is, of course, the initiation of new and expanded housing programs. Table 7 on the following page provides an overall picture of the estimated impact of these programs.

TABLE 7

ECONOMIC IMPACT OF ASSURED HOUSING FOR ONTARIO*

Policy	Gov't Cost (\$ Mill.)	Jobs Created (Person-Yrs.)	Production Value (\$Mill.)
Market Housing	257.3	29,400	639
Private Sector Initiative**	~-	76,300	1,839
Social Housing***	208.6	73,700	2,010
Building Indus- try Strategy	Under Review	20,000	683
Total Impact	480.5	199,400	5,171

Footnotes

- * 2.2 person-years multiplier for jobs created throughout.
- ** Assumes new rent regulation system promotes additional private activity in the following amounts: 1,100 in 1986, 3,600 in 1987, 9,200 in 1988, 10,400 in 1989 and 10,400 in 1990.
- *** Assumes continuation of federal/provincial cooperation from past two decades or more.

NOTE: Actual provincial expenditures exceed \$500 million; items which do not relate to job creation have been removed from above figures.

FOSTERING CO-OPERATION AMONG PRODUCERS, CONSUMERS AND GOVERNMENTS

Meaningful co-operation involves three things:

- o sensitive leadership by elected officials in providing a framework for useful dialogue among diverse and competing interests;
- o continuous sharing of information on the scope of change which can be feasibly managed, given the overall responsibilities of the government;
- o specific, practical agenda items and support for the collection of information by those participating in the process.

The most contentious issue between the public and private sectors, and between major interests in the private sector is obviously rent review. The potential gains to be achieved by co-operation on this program are also the largest: reasonable rents and standards of maintenance for tenants, a sound investment for rental property owners, construction activity for the work force, lower subsidy costs for the taxpayer.

The creation of a Rent Review Advisory Committee has already been signalled in the sections on rent review. This Committee will have immediate, demanding work to do in helping to flesh out the new legislation to reform the whole rent review system.

Municipalities have one of the most extensive and crucial roles in the housing field. Their approval processes are the point at which good quality, affordable residential development may happen or be derailed. They are on the "front lines" of enforcing standards. More and more, they have entered the field of affordable housing themselves. They are often the first to feel the effects of housing shortages and homelessness through the demand for emergency shelter. City aldermen regularly receive calls from those in desperate situations.

An active, creative role for municipalities is a basic tenet of Assured Housing for Ontario. This is being recognized through six specific initiatives. First is provision of some financial assistance to municipalities to cover initial staffing and design costs to monitor and track the status of their housing stock. The Ministry of Housing can conduct one-shot studies of housing conditions. It is essential for those in daily contact via inspection reports, building permits, demolition permits, development plans, etc. to be able to keep close tabs on what is happening.

Second is provision of incentive grants to municipalities for senior citizen retirement communities and starter homes as demonstration projects, already described. Municipalities can be a maj'r source of innovation in the housing field. Not ever thing needs to be invented at Queen's Park or in the federal government. More scope should exist for local experimentation.

Third is provision of development funding to municipalities (and to other sponsors) to initiate non-profit housing projects. This could result in future joint ventures between municipalities and private sector developers, among other things.

Fourth is the adoption of the Association of Municipalities of Ontario proposal to redirect Ontario Home Renewal Program funds currently held inactively in trust; this was a courageous proposal. It deserves support.

Fifth is acceleration of a co-operative effort with municipalities to revise, streamline and coordinate municipal and provincial building regulations. It is a matter of the highest priority that this system function efficiently and effectively. This is a main thrust of the Building Industry Strategy.

Sixth is provision for regular meetings between the Minister of Housing, his colleague the Minister of Municipal Affairs, and the Association Municipalities of Ontario. Frequent informal sessions will also occur between the Minister and mayors and councillors.

The Government of Ontario believes the Province and municipalities should be partners. Its housing and building policies are but one reflection of this belief.

This position paper was written after extensive consultation with tenants' associations, landlords, builders' associations, the co-operative movement, private and municipal non-profit groups, mortgage lenders and others who have a deep interest in housing and building across the province. Because of the short period available, these consultations were sometimes too brief. As conditions change and new policies are

introduced, views naturally change. Market conditions
prompt associations and groups to undertake new
research and to look for other solutions.

The Minister of Housing has every intention of keeping up the active pace of the dialogue which has been established since the summer of 1985, not only through the more formal mechanisms mentioned above, but on an individual basis as well.

WHERE DO WE GO FROM HERE?

The Ontario Government's plan for implementing assured housing has five main points:

- o two short bills to secure the 4% rent guideline and the 5% cap on refinancing costs;
- o a bill to provide for a comprehensive overhaul of the rent review system;
- o a bill to provide greater protection against unnecessary demolitions and other ways in which the affordable rental stock is being eroded;
- o action under existing authorities to implement the various initiatives to promote increased housing supply, to test new housing forms and to assist the building industry;
- o further policy development and consultation with key interests affected and with the public of Ontario to produce a second stage of assured housing initiatives.

The first three groups of initiatives have already been described in some detail above. The longer-term housing policy development process includes:

- o certain outstanding rent review issues, such as "key money", already described;
- o innovative approaches to establishing fair rents between tenants and landlords;
- o strategies for meeting the special needs of roomers/boarders, students, and natives;
- o strategies for the orderly disposal of provincial land holdings;
- o further evolution of regional planning and development strategies in the province as they affect housing;
- o further evolution of measures to make better use of the existing stock of housing and to conserve it.

Both joint consultation mechanisms and public discussion papers will be used to produce workable policies in each of these fields.

Of more immediate interest to most people concerned with housing in the province is the plan for implementing the policies and proposals contained in this paper.

For ease of reference, the further work required, and the anticipated start date for each program or initiative has been set out in Table 8 on the next two pages.

TABLE 8

PLAN FOR IMPLEMENTATION OF ASSURED HOUSING FOR ONTARIO

		ACTION REQUIRED	START DATE
1.	RENT REVIEW	Legislation on 5% cap, 4% rent increase guideline	Depends on passage; effective Aug. 1/85
		Overall reform legislation	Dapends on passage; p. Thaps Spring 1986
2.	RENT REGISTRY	Legislation, development of detailed procedures	Spring 1986; rents as of August 1, 1985 to be filed
3.	NON-PROFIT HOUSING: SUBSIDIES	Agreement with Federal government	Early 1986
4.	NON-PROFIT HOUSING: DEVELOPMENT LOANS	Development of criteria for cost control	Early 1986
5.	PRIVATE RENTAL HOUSING, INTEREST-FREE LOANS	Development of proposal call procedures	January 1986
6.	HIGH-RISE RENTAL REPAIR (DEMONSTRATION)	Development of selection criteria for projects	December 16, 1985
7.	LOW-RISE RENTAL REHABILITATION	Development of detailed program criteria and forms	December 16, 1985
8.	DEVELOPMENT SITES ON PROVINCIAL LAND	Completion of inventory and disposal criteria	May 1986
9.	MANAGEMENT AND TECHNICAL ASSISTANCE	Completion of negotiations with property owners' associations	December 16, 1985
10.	MUNICIPAL TRACKING SYSTEM	Completion of program criteria	December 16, 1985

TABLE 8 Cont'd.

11.	RENT-TO- INCOME ASSISTANCE	Ready to go; depends on other programs	December	16,	1985
12.	ONTARIO HOME RENEWAL PROGRAM REALLOCATION	Detailed negotiations with AMO	December	16,	1985
13.	EXPANDED HOMESHARING	Ready to go	December	16,	1985
14.	EXPANDED CONVERT-TO-RENT	Ready to go	December	16,	1985
15.	RETIREMENT COMMUNITIES DEMONSTRATION	Development of detailed program criteria	December	16,	1985
16.	SENIOR CITIZENS' EQUITY CO-OPERATIVES (DEMONSTRATION)	Development of detailed program Criteria	December	16,	1986
17.	STARTER HOMES (DEMONSTRATION)	Consultation with municipalities	December	16,	1985
18.	BUILDING INDUSTRY	Implementation	December	16,	1985

STRATEGY

CONCLUSION

This position paper is a statement of firm policy intentions by the Government of Ontario. Some of those intentions will need to be debated at length in the Legislature. Others can be implemented as quickly as proper procedures can be determined. But one of the firm intentions is also to invite additional suggestions and responses from the people of this province. No policy is ever complete and perfect. If you have comments about the positions taken in this paper, please feel free to send them to:

Communications Branch Ministry of Housing 777 Bay Street Toronto, Ontario M5G 2E5







